

REMARKS

Claims 6, 9, 10, 25, 28, 29, 32, 33, 35, 43 and 45-47 and 50-56 are pending in the application as claims 8, 48 and 49 are cancelled, and claims 54-56 are added herein. Claims 6, 8-10, 25, 28, 29, 32, 33, 35, 43 and 45-53 were rejected, and claims 10, 25, 35, 43 and 50-52 are amended herein. It is to be appreciated that while reference may be made back to certain parts of the application in this Reply (e.g., page numbers, line numbers, Figs., etc.), that such referencing is not to be interpreted in a limiting manner (e.g., to limit the scope of the claims and/or features therein to the particular portion(s) referenced), but is instead merely done for purposes of explanation, illustration and/or ease of understanding. Reconsideration of the application in light of the following remarks is respectfully requested.

I. REJECTION OF CLAIMS 43, 51 AND 52 UNDER 35 U.S.C. §101

Claims 43, 51 and 52 are rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Withdrawal of this rejection is respectfully requested for at least the following reasons.

Independent claim 43 has been amended to include, among other things, a computer readable memory device. It is respectfully submitted that a computer readable memory device comprises statutory subject matter.

For at least the foregoing reasons, amended independent claim 43 and the remaining rejected claims depending therefrom are believed to be directed toward statutory subject matter, and withdrawal of the rejection is respectfully requested.

II. REJECTION OF CLAIMS 8, 48, 49 AND 53 UNDER 35 U.S.C. §112, FIRST PARAGRAPH

Claims 8, 48, 49 and 53 are rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the written description requirement. For example, claim 53 is rejected because the original disclosure allegedly does not disclose "if a direct mapping scheme does not exist..."; "if it is determined that a direct mapping scheme

does exist....” Withdrawal of this rejection is respectfully requested for at least the following reasons.

Claims 8, 48 and 49 are cancelled herein.

It is respectfully submitted that **independent claim 53**, as presented, satisfies the written description requirement of 35 U.S.C. § 112, first paragraph. For example, paragraph [46] of the instant application provides for, among other things, “converting from a first language to a second language **using an intermediary...where there is no direct mapping scheme available** from the first language to the second language.” For example, in one embodiment, if there is no direct mapping scheme from Hindi (e.g., the alphabet of the text string) to Telugu (e.g., an Indic language), an intermediary (e.g. English) may be used. It is thus respectfully submitted that the instant application does provide for, among other things, using an intermediary language if there is no direct mapping scheme available from a first to a second language. It is respectfully submitted that an ability to determine if a direct mapping scheme **is not** available implies an ability to determine if the direct mapping scheme **is** available.

For at least the foregoing reasons, withdrawal of this rejection is respectfully requested.

III. REJECTION OF CLAIMS 8 AND 49 UNDER 35 U.S.C. §112, SECOND PARAGRAPH

Claims 8 and 49 are rejected under 35 U.S.C. § 112, second paragraph, for allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Withdrawal of this rejection is respectfully requested for at least the following reasons.

Claims 8 and 49 are cancelled herein.

For at least the foregoing reasons, withdrawal of this rejection is respectfully requested.

IV. REJECTION OF CLAIMS 6, 8-10, 25, 28, 29, 32, 33, 35, 43 AND 45 UNDER 35 U.S.C. §103(a)

Claims 6, 8-10, 25, 28, 29, 32, 33, 35, 43 and 45 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman et al., U.S. Patent No.: 7,369,986 (*hereinafter* "Janakiraman"), in view of Virga et al., "Transliteration of proper names in cross-language information retrieval," ACL 2003 (*hereinafter* "Virga"). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Independent claims 6 and 43 provide for, among other things, converting a text string in a first alphabet to a phonetic string in a second alphabet based on a first predefined phonetic mapping scheme between the first alphabet and the second alphabet, **the second alphabet different than the first alphabet**; and converting the phonetic string in the second alphabet to a phonetic string in a third alphabet based on a second predefined phonetic mapping scheme between the second alphabet and the third alphabet, **the third alphabet different than the second alphabet and different than the first alphabet**. In this way, a text string in English (which uses a Latin alphabet) may be converted to a phonetic string in Hindi (which uses a Devanagari alphabet) and then converted to a phonetic string in Telugu (which uses a Telugu alphabet), for example.

It is respectfully submitted that the cited references fail to teach these features alone or in combination. For example, in the Office Action dated 7/29/2010, it is admitted that Janakiraman does not disclose transliteration through an intermediary language. Moreover, it is respectfully submitted that Virga, alone or in combination with Janakiraman, fails to teach this feature. Virga teaches transliterating an English name to Chinese characters through Pinyin, which uses a Latin alphabet. That is, the alphabet of English is not different than the alphabet of Pinyin. Instead, both English and Pinyin use the Latin alphabet. It is respectfully submitted that **transliterating an English name to Chinese characters through Pinyin, which uses a Latin alphabet (e.g., the first and second alphabets are not different)**, as taught by Virga, **does not teach** converting a text string in a first alphabet to a phonetic string in a second

alphabet based on a first predefined phonetic mapping scheme between the first alphabet and the second alphabet, **the second alphabet different than the first alphabet**; and converting the phonetic string in the second alphabet to a phonetic string in a third alphabet based on a second predefined phonetic mapping scheme between the second alphabet and the third alphabet, **the third alphabet different than the second alphabet and different than the first alphabet**, as provided in independent claims 6 and 43. For at least the foregoing reasons, it is respectfully submitted that Virga does not teach these features. It is therefore respectfully submitted that the suggested combination fails to teach independent claims 6 and 43. Accordingly, claims 6 and 43 and the remaining rejected claims that depend therefrom are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

V. REJECTION OF CLAIMS 46-53 UNDER 35 U.S.C. §103(a)

Claims 46-53 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman in view of Virga and further in view of Schafer et al., "Inducing Translation Lexicons via Diverse Similarity Measures and Bridge Languages," Proceedings of 6th Conference on Natural Language Learning 2002 (*hereinafter* "Schafer"). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Dependant claim 46 depends from independent claim 6, which is believed to be allowable over Janakiraman in view of Virga for at least the foregoing reasons. Schafer fails to make up for the deficiencies of Janakiraman in view of Virga with regard to claim 6. Independent claim 6 is thus believed to be allowable over the suggested combination, and claim 46 is likewise believed to be allowable over the suggested combination because it depends from claim 6. Accordingly, claim 46 and the remaining rejected claims that depend therefrom are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

Dependant claim 51 depends from independent claim 43, which is believed to be allowable over Janakiraman in view of Virga for at least the foregoing reasons. Schafer fails to make up for the deficiencies of Janakiraman in view of Virga with regard to claim 43. Independent claim 43 is thus believed to be allowable over the suggested combination, and claim 51 is likewise believed to be allowable over the suggested combination because it depends from claim 43. Accordingly, claim 51 and the remaining rejected claims that depend therefrom are believed to be allowable over the suggested combination and withdrawal of this rejection is respectfully requested.

Independent claim 53 provides for, among other things, converting a text string in a first alphabet to a phonetic string in an intermediate alphabet based on a first predefined phonetic mapping scheme between the first alphabet and the intermediate alphabet, **the intermediate alphabet different than the first alphabet**, and converting the phonetic string in the intermediate alphabet to a phonetic string in the second alphabet based on a second predefined phonetic mapping scheme between the intermediate alphabet and the second alphabet, **the second alphabet different than the intermediate alphabet**. In this way, a text string in English (which uses a Latin alphabet) may be converted to a phonetic string in Hindi (which uses a Devanagari alphabet) and then converted to a phonetic string in Telugu (which uses a Telugu alphabet), for example.

It is respectfully submitted that the cited references fail to teach these features alone or in combination. For example, in the Office Action dated 7/29/2010, it is admitted that Janakiraman does not disclose transliteration through an intermediary language. Moreover, it is respectfully submitted that Virga, alone or in combination with Janakiraman, fails to teach this feature. Virga teaches transliterating an English name to Chinese characters through Pinyin, which uses a Latin alphabet. That is, the alphabet of English is not different than the alphabet of Pinyin. Instead, both English and Pinyin use the Latin alphabet. It is respectfully submitted that **transliterating an English name to Chinese characters through Pinyin, which uses a Latin alphabet (e.g., the first and second alphabets are not different)**, as taught by Virga, **does not**

teach converting a text string in a first alphabet to a phonetic string in an intermediate alphabet based on a first predefined phonetic mapping scheme between the first alphabet and the intermediate alphabet, **the intermediate alphabet different than the first alphabet**, and converting the phonetic string in the intermediate alphabet to a phonetic string in the second alphabet based on a second predefined phonetic mapping scheme between the intermediate alphabet and the second alphabet, **the second alphabet different than the intermediate alphabet**, as provided in independent claim 53. For at least the foregoing reasons, it is respectfully submitted that Virga does not teach these features, and it is also respectfully submitted that Schafer fails to make up for the deficiencies of Janakiraman in view of Virga with regard to claim 53. It is therefore respectfully submitted that the suggested combination fails to teach independent claim 53. Accordingly, claim 53 is believed to be allowable over the suggested combination.

For at least the foregoing reasons, withdrawal of this rejection is respectfully requested.

VI. NEW CLAIMS 54-56

Claims 54-56 are added herein, and are believed to be allowable over the cited references for at least the following reasons. For example, **claim 54** and **claim 55**, which is supported at least by Paragraph [42] of the instant application, depend from claim 53, which is believed to be allowable for at least the foregoing reasons. **Claim 56**, which is supported at least by Paragraph [43] of the instant application, depends from claim 55.

For at least the foregoing reasons, new claims 54-56 are believed to be allowable over the cited references. Allowance of the same is therefore respectfully requested.

VII. CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be in condition for allowance.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application; the Examiner is invited to contact the undersigned at the telephone number provided below.

Should and fees be due as a result of the filing of this response, the Commissioner is hereby authorized to charge the Deposit Account Number 50-5088, **306213.01**.

Respectfully submitted,
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